ENVIRONMENTAL • GEOTECHNICAL
BUILDING SCIENCES • MATERIALS TESTING

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July 15, 2019

Black River Design
c/o Jesse Remick
73 Main Street, Room 9
Montpelier, VT 05602

RE: 2019 Limited Phase II
Burlington High School (BHS)
52 Institute Road
Burlington, VT 05401
Project #280EM00417

Dear Jesse:

ATC Group Services, LLC. (ATC) presents this letter report detailing results of the limited Phase II site investigation conducted at the above reference site on June 5, 2019. Based on the April 26, 2019 Phase I Environmental Site Assessment and your May 14, 2019 electronic mail, ATC provided the following scope of work:

Two (2) USTs suspected beneath the concrete slab associated with Building G

ATC was able to confirm the presence of one (1) UST beneath the Building G slab. Based on the presence and location of a fill port associated with the UST, this UST is suspected to have been used for fuel oil. ATC advanced a dip stick into the UST and measured 4" of water. No odor or visual indication of fuel oil was observed on the dip stick. No evidence of a release was noted.

ATC was unable to confirm the presence of a second UST.

Although Building G is not included within the scope of the upcoming facility renovation, ATC recommends closure of the fuel oil UST in accordance with state and federal regulations as a best management practice.

Building F Elevator Pit – Evidence of historic releases

ATC was able to advance a coring tool through the concrete slab within the Building F elevator pit. Soils beneath the slab were found to consist of fine to very fine sands mixed with angular pebbles. The soils were field-screened with a photoionization detector (PID) equipped with a 10.6 eV lamp to measure total organic vapors (TOVs) and were also evaluated for visual or olfactory indications of contamination. No visual or olfactory evidence of contamination was noted and all PID readings were 0.0 parts per million volume (ppmv).

A soil sample (F-Elevator-01) was collected, stored on ice, and transported to TestAmerica of South Burlington, VT under appropriate chain of custody procedures. The sample was analyzed for polychlorinated biphenyls (PCBs) via EPA Method 8082.

EXHIBIT
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Sample results were compared to Vermont Soil Standards (VSSs) as outlined in Appendix A of the Vermont Investigation and Remediation of Contaminated Properties Rule (iRule), July 2019. Results were also compared to EPA Regional Screening Levels (RSLs) for residential and industrial soils, April 2019. Refer to **Table 1** for a summary of all results, which indicate PCBs were detected in excess of the residential VSS.

The presence of PCBs in soil constitutes a release in accordance with 35-102(b)(5) of iRule which should be reported to the Waste Management and Prevention Division (WMPD).

Any renovation involving soils beneath the Building G elevator pit be conducted pursuant with a soil handling plan including details on worker protection and disposal practices.

Business Environmental Risk – Development Soils

ATC collected fifteen (15) near surface (0.5 - 1.5' below grade surface) soil samples in accessible locations slated for disturbance during upcoming renovations (as depicted on the "Alternate B Site Layout" dated 04.12.2019) to determine if further investigation as to the presence of development soils on the site will be necessary. Soil samples were not collected beneath existing buildings, asphalt parking areas/roadways, or concrete sidewalks.

The soils were field-screened with a photoionization detector (PID) equipped with a 10.6 eV lamp to measure total organic vapors (TOVs) and were also evaluated for visual or olfactory indications of contamination. No visual or olfactory evidence of contamination was noted and all PID readings were 0.0 parts per million volume (ppmv).

The samples were collected, stored on ice, and transported to TestAmerica of South Burlington, VT under appropriate chain of custody procedures. The samples were analyzed for polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270 selective ion monitoring (SIM) and RCRA Metals – Arsenic and Lead to evaluate urban background contaminants.

Sampling results were compared to VSSs. Refer to **Table 1** for a summary of detectable results which indicate the presence of Benzo(a)pyrene above the residential VSS in 13 of 15 borings and above the non-residential VSS in 4 of 13 borings.

Because the site is situated within an Urban Soil Background Area, as per the VT Agency of Natural Resources Atlas, the Toxic Equivalent Quotient (TEQ) formula was applied to the PAHs. Refer to **Table 2** for a summary of PAH results expressed as the TEQ for benzo(a)pyrene. After the TEQ was applied, soils in 6 borings were found to be above the residential VSS yet below the VT Urban Background Soil Standard (BSS). Soils in 5 borings were found to be above the VT Urban BSS and the non-residential VSS. Soils in 3 borings were found to above the VT Urban BSS and the residential VSS yet below the non-residential VSS. Refer to **Appendix A** for the laboratory analytical report. A sample location diagram is included as **Appendix B**.

The samples that exceed the VT Urban BSS and non-residential VSS constitute a release in accordance with 35-102(b)(5) of iRule which should be reported to WMPD. As per IRule procedures, a complete site investigation should be conducted to adequately define the degree and extent of contaminants on-site. The site investigation should be supported by engineered cut and fill plans.

If there are any questions regarding this report, please do not hesitate to contact us at 802-862-1980.

Sincerely,

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Attachments: Figure, Tables, Laboratory Reports